



## MEMO ENDORSED

U.S. Department of Justice

United States Attorney  
Southern District of New York

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601

January 19, 2021

**BY ECF**

The Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: *United States v. Anton Saljanin*, 16 Cr. 420-3 (KMK)**

Dear Judge Karas:

Defendant Anton Saljanin has moved for compassionate release under 18 U.S.C. § 3582 (Dkt. 170), and the Court has ordered the Government to respond by January 21, 2021 (Dkt. 171). Last week, Saljanin filed two “addenda” supplementing his motion. (Dkts. 172 & 173.) In addition, Saljanin’s former counsel in this matter, Jeffrey Chartier, reached out to the Government, to inform us that Saljanin would be filing another supplement addressing a recent death in his family that may provide an additional basis for the motion. On a phone call today, Mr. Chartier confirmed that he expected Saljanin would file that supplement tomorrow.

In light of the defendant’s intention to supplement his motion, and in an effort to streamline the briefing for the Court, the Government writes to request a continuance of the January 21, 2021 response deadline. The Government respectfully proposes to file a response to Saljanin’s motion one week after his anticipated supplement is docketed.

Granted.

So Ordered.

1/19/21

Respectfully submitted,

AUDREY STRAUSS  
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Southern District of New York

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Derek Wikstrom  
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cc: Anton Saljanin (by mail)